

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA (ERIE)

IN RE:)	CASE NO. 24-10166-JCM
)	
RANDY JAY SPENCER,)	Chapter 13
)	
Debtor)	Docket No. _____
)	
GALAXY FEDERAL CREDIT)	Related to Docket Nos. 91 and 92
UNION,)	
)	Hearing: December 3, 2024 at 2:00 pm
Movant)	
)	
vs.)	
)	
RANDY JAY SPENCER and)	
RONDA J. WINNECOUR, ESQUIRE,)	
TRUSTEE)	
)	
Respondents)	

RESPONSE TO DEBTOR'S OBJECTION TO PROOF OF CLAIM NO. 3

AND NOW, this 29th day of October, 2024, comes Galaxy Federal Credit Union ("Galaxy"), by and through its counsel, Knox McLaughlin Gornall & Sennett, P.C., with this Response to Debtor's Objection to Proof of Claim No. 3, stating as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Denied as a legal conclusion to which no response is required. To the extent a response is required, the Debtor fails to provide any basis or reason why he objects to Galaxy's Proof of Claim other than that he apparently just does not like it or feel like paying it. A true and correct copy of Galaxy's Proof of Claim along with a payment history are attached collectively as Exhibit A and are incorporated herein by reference.
5. Denied as a legal conclusion to which no response is required. To the extent a response is required, it is denied.

WHEREFORE, Galaxy respectfully requests that the Debtor's Objection to Proof of Claim No. 3 be denied and dismissed and that Galaxy be granted such other and further relief as is necessary and just.

Respectfully submitted,

KNOX McLAUGHLIN GORNALL &
SENNETT, P.C.
Attorneys for Galaxy Federal Credit Union

BY: /s/ Mark G. Claypool

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CERTIFICATE OF SERVICE

TO PARTIES IN INTEREST:

I, Mark C. Claypool, certify under penalty of perjury that I served the above-captioned pleading, Response to Debtor's Objection to Proof of Claim No. 3, on the parties at the addresses on the attached matrix, on October 29, 2024 by first class, United States mail, postage pre-paid and/or electronic transmission.

BY: /s/ Mark G. Claypool
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SERVICE MATRIX

Via US mail:

Galaxy Federal Credit Union
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Randy Jay Spencer
166 Garden Lane
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Via CM/ECF

Office of the United States Trustee

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